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VIA ECF

Judge John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Eastern Profit Corporation Limited v. Strategic Vision US LLC*,
Civil Action No. 18-CV-2185(JGK)

Dear Judge Koeltl,

Pursuant to Local Rule 37.2 and Your Honor's Individual Rules of Practice plaintiff Eastern Profit Corporation Limited ("Eastern") hereby respectfully requests a pre-motion conference to discuss its proposed motion for a protective order in response to Strategic Vision U.S. LLC's ("Strategic Vision") challenge to the designation of certain materials as "confidential."

On May 29, 2019, Strategic Vision formally challenged the confidentiality designation made by Eastern in its document productions. On June 7 and 10, 2019, counsel for Eastern and Strategic Vision telephonically met and conferred to discuss Strategic Vision's challenges and to potentially narrow the scope of the discovery dispute. Unfortunately, at the June 10, 2019 meet and confer, Strategic Vision's counsel advised Eastern's counsel that they would be withdrawing from the case and therefore could not effectively confer regarding the challenged designations.

The Confidentiality Order requires Eastern to move for a protective order within 10 business days of a challenge. Dkt. No. 40 ¶ 9. Since Eastern cannot actually so move without running afoul of Local Rule 37.2 and Your Honor's Individual Rules of Practice, Eastern hereby respectfully requests a pre-motion conference and a future date certain for it to move for a protective order. Eastern notes that it would like to meet and confer further with Strategic Vision concerning this issue, but effectively has no "dance partner" given the anticipated withdrawal of Strategic Vision's counsel from this case. Eastern is ready, willing and able to further confer, and will happily do so with Strategic Vision's new counsel (yet to be identified) between today and the date a pre-motion conference is set, to hopefully obviate the need for motion practice.

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For the Court's reference, the contested designations at issue all concern documents which would publicly disclose the identities of, and background information concerning, the individuals who were the subjects of the private investigation at issue in this case. Such information falls within the ambit of "confidential research" as that term is used in Rule 26(c)(1)(G) of the Federal Rules of Civil Procedure, which is the definitional guidepost agreed to by the parties in their Stipulated Protective Order. Dkt. No. 40.

Eastern Profit Corporation Limited

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